

REMARKS

In view of the following remarks, Applicants respectfully request reconsideration and allowance of the subject application. This amendment is believed to be fully responsive to all issues raised in the Office Action
5 mailed July 12, 2004.

Claim Rejections

Claims 1-17 have been canceled. Accordingly, the rejections of these claims are moot.

10 Claims 18-20 were rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,654,801 to Mann ("Mann"). Applicants traverse these rejections. To establish a *prima facie* case of obviousness the Action must establish that all limitations recited in the claim are disclosed or suggested by the cited reference. See, MPEP 2143.03. Applicants assert
15 that the Action has failed to establish a *prima facie* case of obviousness because Mann fails to disclose (or even to suggest) numerous features recited in claim 18.

Claim 18 recites the limitation of "an integrated management agent capable of managing components of a storage area network (SAN), the
20 Integrated management agent comprising a device agent." The Action asserts that Mann teaches this limitation, appears to equate the Network Control Console described in Mann at column 5, lines 40-53 to the integrated management agent recited in claim 18.

Claim 18 further recites the limitation that "the device agent comprising an object-based device handler sublayer and a protocol-dependent device handler sublayer, the protocol-dependent device handler sublayer comprising multiple modules, each respective module of the 5 multiple modules adapted to support a respective device-type-specific protocol." The Action asserts that Mann teaches this limitation, and cites column 6, lines 24-30 and column 11, lines 14-22 to support the rejection.

Applicant disagrees. The cited text reads as follows:

10 PoPs, such as the simplified example shown in FIG. 1, are located throughout the distributed data communications network. PoPs will generally comprise more services than are shown in FIG. 1 and may include more than one node handling network management interface capabilities. It is the task of the 15 network management system of this invention to manage all the services and interfaces housed at the numerous PoPs comprising the comprehensive network.

20 FIG. 6 is a flow chart illustrating a method for seamless integration of a new service or node within a data communications network management system, in accordance with a presently preferred embodiment of the present invention. At 300, a node or service is started manually at a Point of Presence within a data communications network. Manually, in this sense, refers to a service or node that is started or added at 25 one of the numerous PoPs in the distributed data communications network without a command to do so being issued from the network management operation center.

Nothing in the cited text discloses or suggests any particular structural features of the NCC described in column 4, lines 40-53, much less the 30 particular structural features recited in claim 18.

Claim 18 further recites the limitation "wherein a particular module of the multiple modules that is adapted to support a particular device-type-specific protocol may be installed to or uninstalled from the protocol-dependent device handler sublayer independently of other modules of the 5 multiple modules while the integrated management agent is running." The Action asserts that Mann teaches this limitation, and cites column 12, lines 13-47 to support the rejection. Applicant disagrees. The cited text reads as follows:

10 FIG. 6 is a flow chart illustrating a method for seamless integration of a new service or node within a data communications network management system, in accordance with a presently preferred embodiment of the present invention. At 300, a node or service is started manually at a Point of
15 Presence within a data communications network. Manually, in this sense, refers to a service or node that is started or added at one of the numerous PoPs in the distributed data communications network without a command to do so being issued from the network management operation center. The service or node being started has an associated service or
20 control adapter running and is in communication with an information bus. At 310, the newly started node or service begins sending out operational status signals over the information bus. These signals are published as heartbeat events on to an information bus. Heartbeat events are published
25 at a prescribed interval to alert subscribing entities that a specific node or service is still functional.

At 320, these signals are received by an unknowing network management control host. The host has no identity information in its database for this new service or node,
30 therefore, at 330, the network management control host sends out signals requesting identification information. These signals are published as discover events by the database adapter. At 340, these identification request signals are received by the new service or node and the associated control adapter or service
35 adapter sends signals with the requested identification information supplied therein. These events are published as identity events in response to received discover events. At 350, the subscribing network management control host receives the identity information and stores such in its database. The new service or node has now been integrated into the data
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communications network management system and the identifying information is kept on file for future reference.

Nothing in the cited text discloses or suggests installing or uninstalling protocol specific modules from a protocol-dependent device handler
5 sublayer, as recited in claim 18.

In sum, Mann fails to disclose or suggest limitations recited in claim 18. It is therefore respectfully submitted that the Action fails to establish a *prima facie case of obviousness*, and that claim 18 is allowable and in condition for allowance.

10 Although each pending dependent claim 19-35 includes additional element(s) militating toward allowability, it is respectfully submitted that dependent claims 19-35 are allowable at least for the reasons given above in connection with independent claim 18.

CONCLUSION

Claims 18-35 are believed to be in condition for allowance.

Applicants respectfully request reconsideration and prompt allowance and issuance of the present application. Should any issue remain that prevents 5 immediate allowance of the application, the Examiner is encouraged to contact the undersigned attorney to discuss the unresolved issue.

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Respectfully Submitted,
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